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*Attorney for Plaintiff*  
JENNY SHAO

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

JENNY SHAO,

Plaintiff,

vs.

URBAN ALCHEMY, *et al.*,

Defendants.

Case No. 3:23-cv-6300-CRB

**JOINT STIPULATION AND ~~PROPOSED~~  
ORDER CHANGING TIME OF CASE  
MANAGEMENT CONFERENCE AND  
CHANGING DEFENDANT ROBERT  
MOORE'S TIME TO RESPOND TO FIRST  
AMENDED COMPLAINT**

Civil L.R. 6-1; 6-2

Conference Date: March 22, 2024

Time: 8:30 a.m.

Place: Phillip Burton Federal Building  
450 Golden Gate Avenue  
San Francisco, CA 94102

WHEREAS, on December 8, 2023, Plaintiff JENNY SHAO initiated the above-captioned Action by filing a Complaint for Damages and Injunctive Relief for Violations of Civil Rights (ECF 1);

WHEREAS, on December 11, 2023, this Case was assigned to Magistrate Judge Thomas S. Hixson (ECF 3) and an Initial Case Management Conference was scheduled for March 7, 2024 (ECF 4);

WHEREAS, on January 17, 2024, before any Defendant was served, Plaintiff filed a First Amended Complaint for Damages and Injunctive Relief for Violations of Civil Rights (ECF 10) ("FAC");

WHEREAS, on February 8, 2024, Plaintiff and Defendant CITY AND COUNTY OF SAN FRANCISCO entered into a Stipulation Extending Time to Respond to Complaint (ECF 13) extending

1 said Defendant's deadline to respond to the FAC to March 1, 2024;

2 WHEREAS, on February 15, 2024, Plaintiff and Defendant URBAN ALCHEMY entered into a  
3 Stipulation Extending Time to Respond to Complaint (ECF 17) extending said Defendant's deadline to  
4 respond to the FAC to March 4, 2024;

5 WHEREAS, on February 23, 2024, the Court entered an Order Reassigning Case (ECF 26)  
6 reassigning this Case from Magistrate Judge Thomas S. Hixson to Senior District Judge Charles R.  
7 Breyer for all further proceedings, and vacating all hearing dates;

8 WHEREAS, on February 23, 2024, an Initial Case Management Conference was set for  
9 March 22, 2024 (ECF 27);

10 WHEREAS, on March 1, 2024, Plaintiff and Defendants URBAN ALCHEMY, CITY AND  
11 COUNTY OF SAN FRANCISCO, ANDREW Q. JUAREZ and RUBEN A. ROMERO entered into a  
12 Stipulation Extending Time to Respond to Complaint (ECF 28) extending said Defendants' respective  
13 deadlines to respond to the FAC to April 9, 2024;

14 WHEREAS, on March 6, 2024, Defendant ROBERT MOORE filed a Waiver of Service  
15 (ECF 32), which waiver extends the deadline for Defendant ROBERT MOORE to respond to the FAC  
16 until May 5, 2024;

17 WHEREAS, per the request of Plaintiff, and to accommodate the other parties and the timely  
18 prosecution of this matter, Defendant ROBERT MOORE has agreed to a shortened time period for his  
19 response, until April 19, 2024, but no sooner than this date.

20 WHEREAS, Plaintiff represents that Defendant MID-MARKET FOUNDATION<sup>1</sup> has very  
21 recently retained legal counsel and that Plaintiff and said Defendant have agreed to an extension of time  
22 for said Defendant to evaluate the Case and respond to the FAC, which agreement Plaintiff expects to be  
23 reflected in a separate stipulation to be filed with the Court promptly hereafter;

24 WHEREAS, at least one Defendant is contemplating filing a Motion to Dismiss, the Court's  
25 decision upon which could affect the scope of the Case and, as such, could also affect the scope of  
26

27  
28 <sup>1</sup> Plaintiff represents that although Defendant Mid-Market Foundation is not a party to this Stipulation,  
said Defendant's newly-retained legal counsel has informed Plaintiff's counsel that Mid-Market  
Foundation has no objection to the relief sought herein.

1 discovery and trial as well as the time needed for the pre-trial and trial deadlines;

2 IT IS HEREBY STIPULATED that Defendant ROBERT MOORE's deadline to respond to the  
3 FAC is changed to April 19, 2024; and

4 IT IS FURTHER STIPULATED that the date of the Initial Case Management Conference should  
5 be changed from March 22, 2024 to June 7, 2024 (with related deadlines adjusted accordingly).

6 Stipulated by Plaintiff JENNY SHAO:

7 Dated: March 8, 2024

8  
9 By: /s/ Donald Cloyce Wagda  
10 DONALD CLOYCE WAGDA (Cal. Bar No. 257254)  
11 380 Hamilton Avenue #72  
12 Palo Alto, California 94301  
13 Telephone: (650) 644-7151  
14 donald@WagdaLaw.com

15 *Attorney for Plaintiff*  
16 JENNY SHAO

17 Stipulated by Defendant URBAN ALCHEMY:

18 Dated: March 8, 2024

19 By: /s/ Kere K. Tickner  
20 KERE K. TICKNER (Cal. Bar No. 174777)  
21 McGlinchey Stafford PLLC  
22 18201 Von Karman Avenue Suite 350  
23 Irvine, California 92612  
24 Telephone: (949) 381-5925  
25 Facsimile: (949) 271-4040  
26 Email: ktickner@mcglinchey.com

27 *Attorneys for Defendant*  
28 URBAN ALCHEMY

1 Stipulated by Defendants CITY AND COUNTY OF SAN FRANCISCO, ANDREW Q JUAREZ  
2 AND RUBEN A. ROMERO:

3 Dated: March 8, 2024  
4

5 By: /s/ Katherine B. Bearman  
6 KATHERINE B. BEARMAN

7 DAVID CHIU, State Bar #189542  
8 City Attorney  
9 JAMES F. HANNAWALT, State Bar #139657  
10 Acting Chief Trial Deputy  
11 KATHERINE B. BEARMAN, State Bar #280561  
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21 *Attorneys for Defendants*  
22 CITY AND COUNTY OF SAN FRANCISCO  
23 ANDREW Q. JUAREZ  
24 RUBEN A. ROMERO

25 Stipulated by Defendant ROBERT MOORE:

26 Dated: March 8, 2024  
27  
28

29 By: /s/ Larry A. Helfman, Esq.  
30 LARRY A. HELFMAN, ESQ., State Bar no. 146523  
31 FRIEDENTHAL, HEFFERNAN & BROWN, LLP  
32 1520 W. Colorado Boulevard, Second Floor  
33 Pasadena, California 91105  
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**FILER'S ATTESTATION**

Pursuant to Civil L.R. 5-1(i)(3), I, Donald Wagda, declare under penalty of perjury under the laws of the State of California that each of the other signatories hereto has concurred in the filing of this document.

Dated: March 8, 2024

/s/ Donald Cloyce Wagda

DONALD CLOYCE WAGDA

*Attorney for Plaintiff*

JENNY SHAO

**~~PROPOSED~~ ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

A Joint Case Management Statement due by May 31, 2024. Case Management Conference set for June 7, 2024 at 8:30 a.m.

Dated: March 13, 2024



HON. CHARLES R. BREYER

United States Senior District Judge